

**McMANIMON, SCOTLAND & BAUMANN, LLC**

75 Livingston Avenue, Ste. 201

Roseland, NJ 07068

(973) 622-1800

Anthony Sodono, III ([asodono@msbnj.com](mailto:asodono@msbnj.com))

Sari B. Placona ([splacona@msbnj.com](mailto:splacona@msbnj.com))

*Attorneys for Ashcraft & Gerel, LLP*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,

Chapter 11

Case No. 23-12825 (MBK)

Debtor.

**ASHCRAFT & GEREL, LLP'S OPPOSITION TO DEBTOR'S  
OMNIBUS MOTION TO COMPEL IDENTIFIED PLAINTIFF  
FIRMS TO SUPPLEMENT CERTAIN RESPONSES TO DEBTOR'S  
INTERROGATORIES AND REQUESTS FOR PRODUCTION**

Ashcraft & Gerel, LLP ("A&G") requests that the Court deny Debtor's Omnibus Motion to Compel Identified Plaintiff Firms to Supplement Certain Responses to Debtor's Interrogatories<sup>1</sup> and Requests for Production. (Dkt. 638.)

In support of its Opposition, and in the interests of judicial efficiency, A&G adopts and incorporates the arguments set forth by the Official Committee of Talc Claimants in its Opposition to the Debtor's Omnibus Motion to Compel Identified Plaintiff Firms to Supplement Certain Responses to Debtor's Interrogatories and Requests for Production and Objection to the Debtor's Related Application to Shorten Time. (Dkt. 659.)

**WHEREFORE**, A&G respectfully requests that the Court deny the Debtor's Motion to Compel.

---

<sup>1</sup> The Debtor did not serve Interrogatories on A&G.

Dated: June 1, 2023

**McMANIMON, SCOTLAND  
& BAUMANN, LLC**  
*Attorneys for Ashcraft & Gerel, LLP*

By: /s/ Sari B. Placona  
SARI B. PLACONA